

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FERNANDO HIRSCH MERHEJ and
KARIFER MERCANTILE E AGRICOLA
EIRELI,

Plaintiffs,

vs.

I.C.S. INTERNATIONAL CUSTODY
SYSTEM INC., ABC CORPORATIONS 1-50,
ALEJANDRO GIL, and JOHN DOES 1-50,

Defendants.

Index No. 13 CV 0869 (JGK)

MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the Complaint heretofore filed herein, and the accompanying Memorandum of Law signed by Jeffrey E. Glen, attorney for Defendant Alejandro Gil, Defendant Gil will move this Court before the Honorable John G. Koeltl at the United States Courthouse, 500 Pearl Street, New York, NY 10007 at a time and date to be set by the Court or as soon thereafter as counsel can be heard, for an Order dismissing the Complaint pursuant to Federal Rules of Civil Procedure Rules 9(b) and 12(b)(6), and for such other and further relieve as the Court deems just.

Dated: New York, New York
April 19, 2013

ANDERSON KILL & OLICK, P.C.

By: /s/

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